

# Claim for Damages

Alternative Format Available  
See instructions on back.



King County

Department of Executive Services  
Risk Management Division  
Ph: 206-263-2250  
TTY: 800-833-6388

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CLERK  
KING COUNTY COUNCIL

County Claim Number / Clerks Date Stamp

Name: Jane He Luitgaarden  
First, Middle Last (or business name)

Address: See attached  
(Home or business) City State Zip

Business Phone: \_\_\_\_\_ Home Phone: \_\_\_\_\_ Message / Cell Phone: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Email Address: \_\_\_\_\_

Your Address at time of loss / incident: \_\_\_\_\_  
Address City State Zip

Date of Incident: \_\_\_\_\_ Time of Incident: \_\_\_\_\_ Amount Claimed: \$ \_\_\_\_\_

Address / Location of loss/incident: \_\_\_\_\_

Description of Details (Describe how the loss / incident occurred):

see attached

(Attach additional pages and supporting documents as needed.)

KingCounty's Involvement (If possible, please identify employee and/or department involved):

see attached

Witnesses (please provide addresses and phone numbers):

(1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### Complete this section for Metro Transit claims.

Route Number: \_\_\_\_\_ Coach / Vehicle Number: \_\_\_\_\_ Coach / Vehicle License Number: \_\_\_\_\_

I was a:  Bus Passenger  Pedestrian  Owner  Driver of Another Vehicle  Passenger in Another Vehicle

Other (Describe): \_\_\_\_\_

Property Damage (please describe the value and extent of the damage to your home, automobile or personal property. Attach estimates, bills or whatever documentation of damages you may have):

\_\_\_\_\_

Make: \_\_\_\_\_ Model: \_\_\_\_\_ Year: \_\_\_\_\_ License Number: \_\_\_\_\_ Insurance Name: \_\_\_\_\_ Policy Number: \_\_\_\_\_

Were you injured?  No  Yes If yes, then complete the following:  
Describe your injury (Identify your doctors(s)/healthcare provider(s)):

\_\_\_\_\_

Are you still receiving medical treatment?  No  Yes Employer: \_\_\_\_\_

Wage Loss?  No  Yes If Yes, rate of pay: \_\_\_\_\_ Type of work: \_\_\_\_\_

"I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct."

8.21.12 Tacoma, WA  
(Date and Place (City, State))

Jane He Luitgaarden  
Signature  
ATTORNEY 30385

**Claim for Damages  
Department of Executive Services  
Risk Management Division**

**Name:** Janette Luitgaarden  
c/o Connelly Law Offices  
2301 North 30<sup>th</sup> Street  
Tacoma, Washington 98403  
253-593-8360  
[jkays@connelly-law.com](mailto:jkays@connelly-law.com)

**Date of Birth:** 9-5-64

**Your address at the time of loss/incident:** See above

**Date of incidents:** 1-1-2003 to present

**Time of incidents:** See above.

**Amount claimed:** \$1.5 million to \$3 million

**Location of incidents:** King County Sheriff's Department, Sexual Assault Unit  
Regional Justice Center, Kent, Washington

**Description of Details:**

Ms. Luitgaarden is a long-time employee of the King County Sheriff's Office (KCSO). She is currently a detective in the KCSO's Sexual Assault Unit, which is the detective unit that investigates crimes of sexual violence committed against children and adults. For well over a decade, she has worked in the Sexual Assault Unit under the management of various Sergeants including: Jutilla, Provenzo and Mahlum. Ms. Luitgaarden is one of approximately four female detectives in the Sexual Assault Unit.

For well over a decade, while under the management of Jutilla, Provenzo and Mahlum, Ms. Luitgaarden, and other female detectives in the Sexual Assault Unit have been subjected, unfairly and unlawfully, to sexual and gender based harassment. Under the tenure of Jutilla's management of the Sexual Assault Unit, Ms. Luitgaarden was singled out for unfair treatment, verbal abuse, acts of sexual and gender based harassment, and retaliatory actions taken against her for purported acts of "insubordination." For the past nine years, while under the management team of Provenzo and Mahlum, Ms. Luitgaarden was subjected to repeated acts of: verbal abuse against Ms. Luitgaarden; yelling, and screaming at Ms. Luitgaarden in the presence of her peers; openly discussing the size of Ms. Luitgaarden's bottom while in front of her colleagues; comparing the size of Ms. Luitgaarden's bottom to that of another woman's in front of Ms. Luitgaarden and her colleagues; referring to Ms. Luitgaarden's telephone calls as "a call from my wife" and thereby degrading her status as a veteran detective; subjecting Ms.

Luitgaarden to unfair criticism of her work product, while never criticizing her male colleagues for the same work product; threats of retaliation against Ms. Luitgaarden if she spoke in opposition to Provenzo (i.e., to demote Ms. Luitgaarden and send her "back to patrol" or to re-assign her to a different precinct); and other acts of sexual and gender based harassment. For the past nine years, Sergeants Provenzo and Mahlum have also acted in a similarly unfair and unlawful manner to two of Ms. Luitgaarden's co-workers: Ms. Priebe-Olson and Ms. Ferguson.

In contrast, none of the four male detectives who work in the Sexual Assault Unit, supervised by Provenzo and Mahlum, are subjected to the aforementioned abuse and harassment.

Ms. Luitgaarden has suffered significant damages as a result of the chronic and ongoing sexual and gender based harassment by her male superiors. Ms. Luitgaarden has suffered tremendous emotional distress and stress that has impacted her job performance, and pain and humiliation as a result of the years of sexual and gender based harassment at the hands of Jutilla, Provenzo and Mahlum. The years spent working in the toxic, degrading and humiliating environment created by these male managers has taken a toll on her emotionally, physically and mentally.

**King County's Involvement: (if possible, please identify employee and/or department involved)**

The acts of sexual and gender based harassment, and other abuse as detailed above, occurred in the course of Ms. Luitgaarden's employment as a detective with the King County Sheriff's Department, Sexual Assault Unit. The department involved is the King County Sheriff's Department. The employees involved in the discriminatory acts include the following individuals: Sergeants Dave Jutilla, Tony Provenzo and Paul Mahlum. Our investigation is ongoing and may reveal additional individual parties involved.

**Witnesses:** Our investigation is ongoing; to date the following witnesses have been revealed:

Belinda Ferguson  
c/o Connelly Law Offices  
2301 North 30<sup>th</sup> Street  
Tacoma, Washington 98403  
253-593-8360

Janette Luitgaarden  
c/o Connelly Law Offices  
2301 North 30<sup>th</sup> Street  
Tacoma, Washington 98403  
253-593-8360

Marylisa Priebe-Olson  
c/o Connelly Law Offices  
2301 North 30<sup>th</sup> Street  
Tacoma, Washington 98403  
253-593-8360

Detective Michael Gordon  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Detective Chris Knudsen  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Detective Casey Johnson  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Detective Christine Elias  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Detective Patricia Malley  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Jessica Cline  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

Wendy Billingsley  
KCSO, Sexual Assault Unit  
516 Third Avenue  
Seattle, WA 98104

**Property Damage:** N/A

**Were you injured?:** Yes

**Describe your injuries:** See answer to Description of Details above. Our investigation is ongoing and we reserve the right to supplement the damages portion of this claim, including additional witnesses.